Re: Proceeding 25-133

I write to support modernization of Part 97 of the Commission’s rules governing the Amateur Radio Service. My comments are focused on reducing unnecessary regulatory burdens and enabling greater innovation and participation. While much of part 97 could reasonably be simplified, streamlined, or eliminated, I urge the Commission to consider the following specific recommendations:

1. Simplify And Modernize Amateur Licensing

Rules include: 47 CFR § 97.9, § 97.17, § 97.19, § 97.21, § 97.25

Recommendation: Consolidate license classes, grant lifetime license terms, and align U.S. licensing with international frameworks like ITU-R M.1544 and HAREC (T/R 61-02).

Justification: This would reduce barriers to entry, simplify FCC administration, lower long-term costs, and eliminate inequities for U.S. operators abroad. These changes would directly support goals in 47 U.S.C. § 157(a) ("[provisioning] new technologies and services to the public"), § 303(g) ("the larger and more effective use of radio in the public interest"), and § 1302(a) ("[deploying] advanced telecommunications capability to all Americans, including, in particular, elementary and secondary schools and classrooms").

2. Permit Remote And Unattended Operations More Broadly

Rules include: 47 CFR § 97.3(a)(6), § 97.109(d), § 97.213

Recommendation: Remove unnecessary restrictions on remote control, "telecommand," and unattended operation. Replace with a general requirement that operators maintain control and resolve interference.

Justification: These rules no longer reflect the state of technology or common practice in the Internet era. Modernizing these rules supports the FCC's cost-benefit directive and aligns with its guidance on marketplace and technological changes.

3. Clarify Use of Encryption for Authentication

Rule Referenced: 47 CFR § 97.113(a)(4) ("messages encoded for the purpose of obscuring their meaning")

Recommendation: Explicitly permit public-key authentication over amateur bands.

Justification: Public-key authentication does not obscure the content of any message; rather, it enables secure, verifiable communications essential for modern protocols. Clarifying its permissibility would foster innovation in amateur experimentation while maintaining transparency and compliance with FCC rules.

4. Reduce or Eliminate Content Restrictions

Rules include: 47 CFR § 97.113

Recommendation: Maintain prohibition on commercial content, but relax restrictions on non-commercial speech, including incidental music or multimedia experimentation.

Justification: Licensed amateurs have a strong tradition of self-governance and adherence to well-established standards that already apply, including those articulated in Miller v. California, 413 U.S. 15 (1973) and FCC v. Pacifica Foundation, 438 U.S. 726 (1978). Additional content restrictions create administrative burden, stifle experimentation and modern use, and raise unnecessary First Amendment concerns. Section 97.113(a)(5) is particularly outdated and over-broad.

5. Protect Private Data of Licensees

Rules include: 47 CFR § 97.23

Recommendation: Allow licensees to opt out of public disclosure of home addresses. Stop publishing historical name/address data. Simplify processes for updating such data as may be published.

Justification: Current disclosure practices discourage participation and raise legitimate privacy and safety concerns. Alternative approaches, such as that adopted by the FAA, better reflect modern privacy expectations. Section 97.23 could be revised to require name, mailing address, and email for application purposes while withholding that information from public dissemination. Historical license records should likewise omit outdated personal data.

Each of these proposals advances the spirit of the FCC’s retrospective review criteria: eliminating unnecessary burdens, aligning with technological progress in the United States, and better serving the American public interest. Amateur radio has always been a proving ground for American innovation, and Part 97 offers many opportunities for modernization that can help revive that spirit of the Amateur Service.

Respectfully submitted,

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